

Exhibit A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING FOAMS
(AFFF) PRODUCTS LIABILITY LITIGATION**

MDL No. 2:18-mn-2873-RMG

**This Document Relates to
ALL CASES**

DECLARATION OF DUSTIN MIRE

I, Dustin Mire, declare as follows:

1. I am a Partner of Eisner Advisory Group¹ (“EAG” or “EisnerAmper”). In this role, I am responsible for the operations of EisnerAmper’s litigation support and settlement administration programs, including the services it provides in the areas of class action, mass tort, and mass arbitration claims administration. I was previously a Director and Shareholder of Postlethwaite & Netterville, APAC (“P&N”) where I served the same role. Effective May 21, 2023, the Directors and employees of P&N have joined EisnerAmper.

2. I have a Bachelor of Science degree in Business Management and a Masters degree in Business Administration with a specialization in Internal Audit from Louisiana State University. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true.

3. EisnerAmper consistently ranks among the top 20 leading accounting and business

¹ Eisner Advisory Group includes Eisner Advisory Group LLC, its subsidiary entities, including EAG Gulf Coast, LLC, and the team formerly known as Postlethwaite & Netterville, APAC. EisnerAmper is the brand name under which Eisner Advisory Group LLC and its subsidiary entities provide professional services.

advisory firms in the United States with 35 offices and over 4,000 employees.

4. I have led teams that have administered hundreds of litigation support programs and serviced millions of claimants, including in design, implementation and use of portals to aid in the collection of information, data and claims-related documents. Since 1999, the EisnerAmper team has successfully administered numerous class action and mass tort portals, for matters in state court and federal court and comprising claimants nationwide, including for several multidistrict litigations.

5. The EisnerAmper team has designed, built, and maintained claimant portals in numerous MDL litigations, including *In Re: E.I. Du Pont De Nemours and Company C8 Personal Injury Litigation (MDL 2433)*, *In Re: Testosterone Replacement Therapy Products Liability Litigation (MDL 2545)*, *In Re: Proton Pump Inhibitor Products Liability Litigation (MDL 2789)*, *In Re: Paraquat Products Liability Litigation (MDL 3004)*, and *In Re: Paragard IUD Products Liability Litigation*.

6. EisnerAmper has put in place extensive information security processes and employs professionals with strong information technology and data security qualifications. Eisner Advisory Group LLC, EisnerAmper LLP and all applicable subsidiaries maintain their network environment with a managed data center provider with locations exclusively in the U.S. The environment is protected at the perimeter with next-generation firewalls, DMZ, and 24/7 Intrusion Detection & Prevention services. All internal data is encrypted using TLS 1.3 in transit, and AES256 or higher at rest. EisnerAmper employees receive mandatory Information Security and Social Engineering training on an annual basis.

7. Attached hereto as Exhibit B is a true and correct copy of a document titled “EisnerAmper Firm Information and Qualifications.” I have reviewed the document and affirm the statements therein to be true and correct based on my own personal knowledge or based on a review of firm records.

8. I have reviewed Court Management Orders (“CMOs”) 5 and 31 regarding Plaintiff Fact Sheets (“PFS”) and Plaintiff Profile Forms (“PPF”), as well as the parties’ joint motion for entry of a CMO governing the form and procedure for the completion of amended Personal Injury Plaintiff Fact Sheets (ECF No. 6429), and declare that EAG is experienced, qualified, and

ready to serve as Portal Vendor, as described in CMO 31, which will require handling the following tasks: (1) designing, building, implementing and maintaining the Portal in such a way as to receive and reflect any and all completed PFS and PPF and that allows for the production of responsive, non-privileged documents; (2) communicating with the PEC and DCC, including for the provision of reports from the Portal; (3) ensuring the registration of plaintiff law firms within the portal; and (4) all other duties required to comply with CMOs 5G and 31.

9. I declare under penalty of perjury under the laws of the State of Louisiana that the foregoing is true and correct.

Executed on this 3rd day of December, 2024, at Baton Rouge, Louisiana.


Dustin Mire